



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PP:VC:mab
F. #2023R00955

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 16, 2025

By E-Mail and ECF

Allegra Glashausser, Esq.
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Re: United States v. Joseph Grunwald
Criminal Docket No. 24-19 (NRM)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's previous disclosures on March 20, 2024, April 25, 2024, May 2, 2024, June 13, 2024, November 1, 2024 and December 31, 2024. The discovery is being provided to you via USAfx. Please promptly download the material and confirm in writing that you were able to do so.

Please note that this production contains Victim Discovery Material as that term is defined in the March 20, 2024 Protective Order in this matter. (See ECF No. 14.) As such, PDF files containing Victim Discovery Material have been marked as "Victim Discovery Material" on each page.

The government discloses the following:

- Materials received from Google in response to a subpoena, bearing Bates number JG_005589.
- Materials received from T-Mobile in response to a subpoena, bearing Bates numbers JG_005590 to JG_005633.
- Search warrant and affidavit, No. 24-MC-37, bearing Bates numbers JG_005634 to JG_005725 (Victim Discovery Material).

- Materials received from Equifax in response to a subpoena, bearing Bates numbers JG_005726 to JG_005756.
- Materials received from Experian in response to a subpoena, bearing Bates numbers JG_005757 to JG_005778.
- Materials received from Transunion in response to a subpoena, bearing Bates numbers JG_005779 to JG_005782.

The government reiterates its requests for reciprocal discovery.

Very truly yours,

CAROLYN POKORNY
Acting United States Attorney

By: /s/ Vincent Chiappini
Vincent Chiappini
Assistant U.S. Attorney
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Enclosures

cc: Clerk of the Court (NRM) (without enclosure)